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March 14, 2024

***Via ECF and Email***

Hon. Katherine P. Failla  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007  
[Failla\\_NYSDChambers@nysd.uscourts.gov](mailto:Failla_NYSDChambers@nysd.uscourts.gov)

**MEMO ENDORSED**

Re: *Abbey Photographers, Inc. v. Valnet, Inc.*  
Docket No: 1:23-cv-11203-KPF

Dear Judge Failla:

We are the attorneys for Plaintiff Abbey Photographers, Inc. (“Plaintiff”) in this matter. Pursuant to Section 1(C)(i) of Your Honor’s Individual Rules and Practices, we write to respectfully request an adjournment of the initial conference date until at least twenty-one (21) days after Defendant Valnet, Inc. (“Defendant”)’s deadline for responding to the Complaint. The adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant’s response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties’ settlement discussions.

Defendant executed a waiver of service on January 3, 2024, setting April 2, 2024 as Defendant’s deadline to answer the Complaint (ECF No. 9). Pursuant to ECF No. 8, an initial conference is currently set for March 22, 2024. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

*/s/ Renee J. Aragona*  
Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.  
Mitchell Silberberg & Knupp LLP  
*Via email to lre@msk.com*  
*Counsel for Defendant*

Application GRANTED. The initial pretrial conference currently scheduled for **March 22, 2024**, is hereby ADJOURNED *sine die*, pending further order of the Court, which will issue an order rescheduling the conference after Defendant has responded.

The Clerk of Court is directed to terminate the pending motion at docket entry 11.

Dated: March 15, 2024 SO ORDERED.  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE